



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

June 2, 2023

**BY ECF**

The Honorable Jennifer H. Rearden  
United States District Judge  
500 Pearl Street  
Southern District of New York  
New York, New York 10007

**Re: *United States v. Charles McGonigal and Sergey Shestakov*, 23 Cr. 16 (JHR)**

Dear Judge Rearden:

The Government writes to provide a status update.

*First*, the Government responded to Sergey Shestakov's request at the May 10, 2023 status conference for the discovery in *United States v. Olga Shriki*, 22 Cr. 518 (PKC) (S.D.N.Y.). The Government informed Shestakov that the prosecution team in this case does not possess the evidence gathered in *Shriki*, and it is not aware of any evidence in that case that constitutes *Brady* or *Giglio* or is material to the defense in this case.

*Second*, on May 19, 2023, the Government produced to Shestakov the discovery material produced by the United States Attorney's Office for the District of Columbia ("USAO-DC") in *United States v. McGonigal*, 23 Cr. 21 (CKK) (D.D.C.). The Government recently received additional discovery material from USAO-DC, and will produce it to Shestakov's counsel today.

*Third*, on June 1, 2023, the Government made a supplemental discovery production, which included a tax order, a tax order application, and materials received in response to the tax order.

Respectfully submitted,

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Cc: Defense Counsel (by ECF)